



United States Government

NATIONAL LABOR RELATIONS BOARD

Region 8

1240 East 9th Street - Room 1695

Cleveland, OH 44199-2086

Telephone: (216) 522-3715

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www.nlrb.gov

September 19, 2018

Monier Deeb
Freedom Employment Services, LLC
2620 Centennial Road, Suite C
Toledo, Ohio 43617

RE: Midwest Terminals of Toledo International, Inc.
Case Number 08-CA-195939 et al.

Mr. Deeb,

Enclosed, you will find a subpoena *duces tecum* issued to the Custodian of Records requiring the production of certain documents related to Freedom Employment Services, LLC's business relationship with Midwest Terminals of Toledo International, Inc. As you are the listed agent for this company with the Ohio Secretary of State, the subpoena is being sent in your care.

I am currently investigating a number of charges filed against Midwest Terminals of Toledo International, Inc. with the National Labor Relations Board that include allegations by the International Longshoremen's Association, Local 1982 that Midwest Terminals has had non-bargaining unit employees performing bargaining unit work, and has improperly withdrawn recognition from the Union. The investigation of these charges has led to the determination that Freedom Employment Services LLC has certain information necessary to make a determination regarding the allegations.

The company's cooperation is greatly appreciated. The enclosed subpoena was issued by the National Labor Relations Board, a federal agency conducting an impartial investigation of the above charges that have been filed. This is the second subpoena sent to you at this address requiring the production of the listed documents. As no one responded to the first subpoena, the company is being given a second opportunity to comply before the Region seeks enforcement of the subpoena by the United States District Court for the Northern District of Ohio.

If you have any questions regarding the subpoena, or its return date do not hesitate to call me at the number below.

Thank you,

/s/ Kelly Freeman
Kelly Freeman
Field Attorney
(216) 303-7378

Applicant Exhibit G